

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
MCALLEN DIVISION

UNITED STATES OF AMERICA, §  
§ 7:21-cr-01772-7  
v. §  
§  
ROEL VALADEZ JR. §

**DEFENDANT ROEL VALADEZ' MOTION TO REMOVE  
HOME DETENTION AND GPS MONITORING DEVICE**

TO THE SAID HONORABLE COURT:

NOW COMES, Defendant, ROEL VALADEZ, JR., by and through his attorney of record, OSCAR RENE FLORES, files this his Motion to Remove Home Detention and GPS Monitoring Devise and, in support thereof would show the Court as follows:

I.

Defendant herein held the position of precinct 4, Justice of the Peace in Starr County, Texas for approximately three (3) years. Defendant is presently out on Bond under "Home Detention, restricted to his residence at all times except for employment, education, religious services, medical, substance abuse, or mental health treatment, attorney visits, court appearances, court-ordered obligations or other activities pre-approved by the U.S. Probation Office.

Further, Defendant's travel is restricted to the Southern District of Texas. Any outside travel must be pre-approved by the Court.

II.

Defendant Valadez respectfully moves this Court to remove the condition of the Home Detention and GPS monitoring device as he has encountered problems with the device and internet/connectivity issues. As an example, Defendant Valadez has been contacted by the

pretrial services on the following dates and times.

May 14, 2022 at 1:40 p.m. – monitor personnel “no signal”

May 15, 2022 at 6:40 p.m. . Probation Officer, requested defendant Valadez take a drive

May 16, 2022 at 4:55 a.m. monitor personnel “no signal”

May 16, 2022 at 7:45 p.m. Probation Officer, requested defendant Valadez take a drive.

May 28, 2022 at 4:45 a.m. monitor personnel “no signal”

May 28, 2022 at 1058 a.m. Probation Officer, requested defendant Valadez take a drive.

May 29, 2022 at 5:38 a.m. monitor personnel “no signal”

May 29, 2022 at 5:31 p.m. Probation officer, requested defendant Valadez to take a drive.

May 30, 2022 at 7:34 p.m. monitor personnel “no signal”

May 31, 2022 at 7:30 a.m. minor personnel “no signal”

Defendant Valadez has exchanged the monitor, however, he continues to have issues with the device.

Defendant Valadez has been and will continue to be in compliance with pretrial services and his conditions of bond once device is removed.

The undersigned attorney contacted the Assistant United States Attorney, Patricia Profit and she is opposed to the Motion.

**WHEREFORE, PREMISES CONSIDERED**, Defendant prays this Court grants this Motion to Remove Home Detention and GPS Monitoring Device to avoid the inconvenience noted herein.

Respectfully submitted,

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By: *S/ O. Rene Flores*

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Attorney for ROEL VALADEZ, JR.

**CERTIFICATE OF SERVICE**

I, O. Rene Flores, hereby certify that on June 10, 2022 a true and correct copy of the above and foregoing Motion was served on the Honorable Patricia Cook Profit, Assistant United States Attorney in charge of this case via email: [pat.profit@usdoj.gov](mailto:pat.profit@usdoj.gov) by electronic filing system and all attorneys for co-defendants.

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*/S/ O. Rene Flores*  
O. Rene Flores

**CERTIFICATE OF CONFERENCE**

On June 10, 2022, the office of the undersigned attorney conferred with the Honorable Patricia Cook Profit on the Motion, and she is opposed.

*/S/ O. Rene Flores*  
O. Rene Flores